

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

HAROLD T. MARTIN, III

Defendant.

CRIMINAL NO. MJG-17-0069

*
*
*
*
*
*
*

CONSENT MOTION FOR CONTINUANCE OF THE CIPA SECTION 4 DEADLINE

On June 6, 2017, the Court entered an order directing that any *ex parte* submissions pursuant to CIPA Section 4 and Fed. R. Crim. P. 16(d)(1) be filed by September 15, 2017. Since the Court's order, the parties have met and conferred on a number of occasions to discuss and review classified and unclassified discovery, and other matters. The parties have discussed many issues with regards to the scope of discovery, and are working to resolve as many discovery issues as possible without the involvement of the Court.

Given the volume and unique nature of the information involved in this investigation and prosecution, the parties agree that an additional period of time is necessary to allow the parties to resolve discovery matters. Additional time will also allow the government to work with the victim government agencies to address the handling of classified information, and to prepare its *ex parte* submission to the Court under CIPA Section 4 and Fed. R. Crim. P. 16(d)(1).

Therefore, the government respectfully requests an extension of the deadline for filing a motion under CIPA Section 4 and Fed. R. Crim. P. 16(d)(1) to December 15, 2017. Counsel for the government have conferred with counsel for the defendant, who join in and consent to this

motion. The Government understands that the defendant intends to file an *ex parte* submission under Section 4 at or around the same date.

The parties also respectfully request that the Court set in a scheduling conference in chambers for the Court and the parties to set further dates.

Respectfully submitted,

Stephen M. Schenning
Acting United States Attorney

By: _____ /s/
Harvey E. Eisenberg
Assistant United States Attorney
Chief, National Security Section

_____ /s/
Zachary A. Myers
Nicolas A. Mitchell
Assistant United States Attorneys
36 South Charles St., 4th Floor
Baltimore, Maryland 21201
Tel.: (410) 209-4800

_____ /s/
David C. Aaron
Trial Attorney
National Security Division
U.S. Department of Justice